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## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF INDIANA INDIANAPOLIS DIVISION

IN RE: JOHNNY DARRELL LORICK DEBTOR(S) CASE NO. 19-00252-JJG-13

## TRUSTEE'S OBJECTION TO CONFIRMATION

Comes now, Ann M. DeLaney, Trustee herein, and objects to confirmation of the debtor's plan dated 03/04/2019 for the following reason (s):

- 1. Failure to file all state tax returns pursuant to Section 1308 of the bankruptcy code.
- 2. Plan is underfunded; Trustee seeking minimum plan base of \$216,200 to fund 100% plan.

WHEREFORE, after notice and hearing, your Trustee requests the Court enter an order sustaining this objection and ordering an amended plan.

Respectfully submitted,

DATE: October 11, 2019

/s/Ann DeLaney Ann DeLaney P.O. Box 441285 Indianapolis, IN 46244 Telephone: (317) 829-7360 Facsimile: (317) 829-7369

Email:anndelaney341@trustee13.com

## **Certificate of Service**

I do hereby certify that a copy of the foregoing Trustee's Objection to Confirmation has been duly served upon the following individuals, by United States mail, first-class postage prepaid, on this date October 11, 2019:

U.S. Trustee via electronic mail

LAW OFFICES OF MIKE NORRIS via electronic mail

JOHNNY DARRELL LORICK: 6445 HARRISON RIDGE BOULEVARD, INDIANAPOLIS, IN 46236

/s/Ann DeLaney Ann DeLaney